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19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

22 CALIFORNIA COALITION FOR WOMEN  
 PRISONERS et al.,  
 23 Plaintiffs,  
 24 v.  
 25 UNITED STATES OF AMERICA FEDERAL  
 BUREAU OF PRISONS et al.,  
 26 Defendants.

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Case No. 4:23-cv-04155-YGR  
**DECLARATION OF KARA J.  
 JANSSEN IN SUPPORT OF  
 PLAINTIFFS' UNOPPOSED MOTION  
 FOR PRELIMINARY APPROVAL OF  
 PROPOSED CONSENT DECREE**

Date: December 17, 2024  
 Time: 2:00 p.m.  
 Crtrm.: 1, 4th Floor  
 Judge: Hon. Yvonne Gonzalez Rogers  
 Trial Date: June 23, 2025

1 I, Kara J. Janssen, declare:

2 1. I am an attorney duly admitted to practice before this Court. I am a Senior  
3 Counsel in the law firm of Rosen Bien Galvan & Grunfeld LLP, counsel of record for  
4 Plaintiffs and the Class. I have personal knowledge of the facts set forth herein, and if  
5 called as a witness, I could competently so testify. I make this declaration in support of  
6 Plaintiffs' Unopposed Motion for Preliminary Approval of the Proposed Consent Decree.

7 2. Following extensive settlement negotiations, the parties reached agreement  
8 on a Proposed Consent Decree. **Exhibit 1** is a true and correct copy of the Proposed  
9 Consent Decree.

10 3. **Exhibit 2** is a true and correct copy of the Proposed Notice to Class  
11 Members.

12 4. Throughout the litigation of this case, the parties have been zealously  
13 represented by experienced counsel. The Proposed Consent Decree, if approved by the  
14 Court, will resolve all claims for injunctive relief raised in Plaintiffs' Complaint. In  
15 contrast, additional litigation would involve uncertainty and delay for all parties and pose  
16 significant risk.

17 I declare under penalty of perjury under the laws of the United States of America  
18 that the foregoing is true and correct, and that this declaration is executed at San Francisco,  
19 California this 6th day of December, 2024.

20  
21 /s/ Kara J. Janssen  
22 Kara J. Janssen  
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